

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application of Vale S.A., Vale Holdings
B.V., and Vale International S.A. for an Order
Pursuant to 28 U.S.C. § 1782 to Conduct
Discovery for Use in Foreign Proceedings

Case No. 20-mc-199-JGK-OTW

NOTICE OF RULE 30(b)(6) DEPOSITION OF PERFECTUS REAL ESTATE CORP.

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Vale S.A., Vale Holdings B.V., and Vale International S.A. (collectively, “Vale”), by their undersigned counsel Cleary Gottlieb Steen & Hamilton LLP, will take the deposition upon oral examination of Perfectus Real Estate Corp., 555 Madison Avenue, 5th Floor, New York, NY 10022, (“Perfectus”) in this matter. By agreement of the parties, the deposition will begin at 7:00 a.m. EST on February 2, 2022, and will be conducted remotely by videoconference or at such other time or location as may be agreed upon by the parties. By further agreement of the parties, Perfectus has designated Gregg Blackstock as its Rule 30(b)(6) representative, and he shall appear for deposition at the Milan Office of Cleary Gottlieb Steen & Hamilton LLP/Cleary Gottlieb Steen & Hamilton Studio Legale, Via S. Paolo, 7, 20121 Milano MI, Italy. The deposition will continue from day to day thereafter until concluded or adjourned.

The deposition shall be under oath, shall be taken before a court reporter or other person authorized to administer oaths, and will be conducted in accordance with the Federal Rules of Civil Procedure. The deposition will be recorded by stenographic means.

Pursuant to Rule 30(b)(6), Perfectus shall designate one or more officers, directors, managing agents, or other persons to testify on its behalf as to each of the matters set forth in Schedule A.

Dated: January 19, 2022
New York, New York

/s/ Jeffrey A. Rosenthal
Jeffrey A. Rosenthal (jrosenthal@cgsh.com)
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*Counsel for Respondent Perfectus
Real Estate Corp.*

SCHEDULE A

DEFINITIONS

1. This Schedule incorporates by reference the definitions listed in the Subpoena for Documents served on Perfectus Real Estate Corp. (ECF No. 3-21).

INSTRUCTIONS

1. Pursuant to Rule 30(b)(6), the person designated by You must testify about information known or reasonably available to You.

2. Pursuant to Rule 30(b)(6), this Notice is supplemental to and not in lieu of any notice of deposition that Petitioners may serve pursuant to Federal Rule of Civil Procedure Rule 30(b)(1). This deposition does not preclude Petitioners from taking a deposition by means of any other procedure allowed by the Federal Rules of Civil Procedure. Petitioners expressly reserve their right to take the deposition at a later date and pursuant to Rule 30(b)(1) of the deponent identified by You pursuant to Rule 30(b)(6).

MATTERS FOR EXAMINATION

1. The charts annexed hereto as Exhibit 1.
2. Perfectus's document retention policies and the manner in which Perfectus's documents are presently maintained, and have been maintained in the past, including without limitation any custodians responsible for, or who have, retained Perfectus's documents.
3. Perfectus's search for and production of documents in response to the Subpoena for Documents served on Perfectus Real Estate Corp. (ECF No. 3-21).
4. Any funds paid by Vale to BSG Resources Limited ("BSGR") that came to be invested with or provided in any manner to Perfectus, directly or indirectly.
5. Perfectus's current or former, direct or indirect real estate investments.

6. The current or former, direct or indirect ownership of Perfectus, including without limitation beneficial ownership.

7. Perfectus's current or former, direct or indirect relationship to Beny Steinmetz and BSGR, or any other BSG Entities.

8. Perfectus's current or former officers and directors and their direct or indirect relationship with any BSG Entities.

9. The current or former, direct or indirect relationship of any member of Beny Steinmetz's family, or any trust for which Beny Steinmetz or a family member is a direct or indirect beneficiary, with Perfectus or any current or former officer or director of Perfectus.

10. Dag Cramer's current or former, direct or indirect relationship with Perfectus or any current or former officer or director of Perfectus.

11. David Barnett's current or former, direct or indirect relationship with Perfectus or any current or former officer or director of Perfectus.

12. HFZ's, Ziel Feldman's, or Nir Meir's current or former, direct or indirect relationship with Perfectus or any current or former officer or director of Perfectus.

13. Perfectus's board meeting minutes.

14. Perfectus's bank records.

15. Perfectus's tax returns.

16. Perfectus's financial statements.

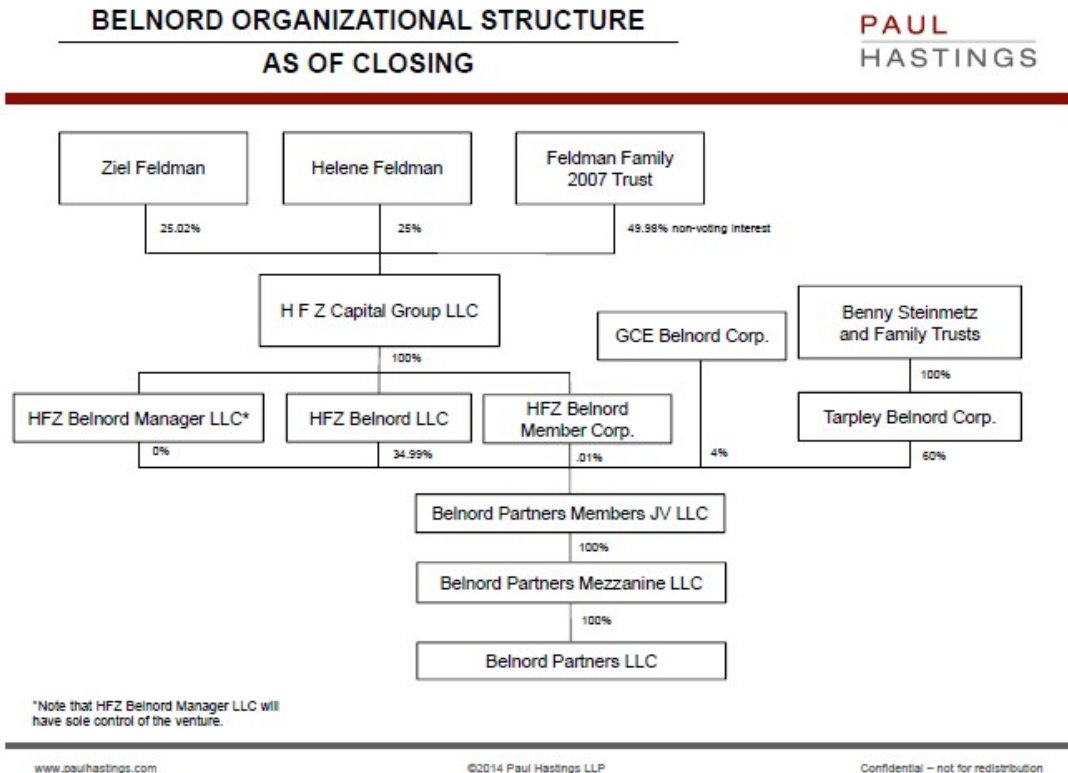
EXHIBIT 1**Figure 1**FILED: NEW YORK COUNTY CLERK 06/28/2021 11:43 PM
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Figure 2